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Attorneys for Debtors and Reorganized Debtors

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

PG&E CORPORATION,

- and -

**PACIFIC GAS AND ELECTRIC
COMPANY,**

- ☐ Affects PG&E Corporation
☐ Affects Pacific Gas and Electric Company
☒ Affects both Debtors

** ALL PAPERS SHALL BE FILED IN THE
LEAD CASE, NO. 19-30088 (DM)*

Case Nos. 19-30088 (DM)

(Lead Case) (Jointly Administered)

**PG&E'S EVIDENTIARY OBJECTIONS IN
OPPOSITION TO DECLARATION OF
AMIR SHAHMIRZA IN SUPPORT OF
CLAIMANT'S SECOND MOTION FOR
PARTIAL SUMMARY JUDGMENT OF
ISSUES**

Date: December 19, 2023
Time: 10:00 a.m. (Pacific Time)
Place: (Tele/Videoconference Only)
United States Bankruptcy Court
Courtroom 17, 16th Floor
San Francisco, CA 94102

Pursuant to the Federal Rules of Evidence, Debtors PG&E Corporation and Pacific Gas and Electric Company hereby object to the declarations and exhibits submitted in support of Claimant's Motion for Partial Summary Judgment and in Support of Debtors' Counter-Motion for Summary Judgment:

Declaration of Amir Shahmirza in Support of Claimant's Second Motion for Partial Summary Judgment of Issues [Docket No. 14007-2]

Paragraph 7(c), at 2:25-26 (the transmission lines were movable and could be relocated")	FRE 602, Lacks Foundation/Personal Knowledge./Speculation; FRE 702-706, Improper Expert Opinion.
Paragraph 8 ("PG&E informed me that it intended to "ensure the safety and reliability of the electric transmission system: through 'improvement project near your [Komir's property.'"	FRE 801, Hearsay.
Paragraph 13 (The Relocation of the Transmission Lines caused the lines to cross the Property at a different location than the Original Transmission Lines.")	FRE 602, Lacks Foundation/Personal Knowledge./Speculation; FRE 702-706, Improper Expert Opinion.
Paragraph 14 ("The Relocation of the Transmission Lines as placed on the New Transmission Towers also caused the lines to cross th Property at a significantly lower height as, according to statements made by PG&E representatives to me on-site, the New Transmission Lines crossed the Property at a lowest height of approximately sixty-two feet (62') (the "New Transmission Line Height") rather than a prior height of approximately seventy three feet (73'). A representatives of PG&E also stated to me that the capacity of the Transmission Lines was increased from 115kV to 230kV, i.e., doubling the high voltage that would	FRE 602, Lacks Foundation/Personal Knowledge./Speculation; FRE 702-706, Improper Expert Opinion; FRE 801, Hearsay.

1	cross the Property.”)	
2	Paragraphs 22 (“Komir cannot	FRE 602, Lacks Foundation/Personal
3	occupy the space through which	Knowledge./Speculation; FRE 702-706, Improper
4	PG&E placed its high voltage	Expert Opinion.
5	lines in any manner or for any	
6	purpose.”)	
7	Paragraph 25 (“At no time dud	FRE 602, Lacks Foundation/Personal
8	PG&E, or any person on its	Knowledge./Speculation; FRE 801, Hearsay.
9	behalf, pay any real property	
10	taxes assessed against the	
11	Property.”	

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Dated: November 3, 2023

KELLER BENVENUTTI KIM LLP
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LAW OFFICES OF JENNIFER L. DODGE, INC.

By: /s/ Steven A. Lamb
Steven A. Lamb
Attorneys for Debtors and Reorganized Debtors